

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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| IN RE: TRIBUNE COMPANY FRAUDULENT | : |
| CONVEYANCE LITIGATION | : |
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| | : |
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| | : |
| -----X | |
| MARK S. KIRSCHNER, as Litigation Trustee for | : |
| The TRIBUNE LITIGATION TRUST, | : |
| | : |
| | : |
| Plaintiff, | : |
| | : |
| | : |
| -against- | : |
| | : |
| | : |
| DENNIS J. FITZSIMONS, <i>et al.</i> , | : |
| | : |
| | : |
| Defendants. | : |
| -----X | |

Consolidated Multidistrict Action
11 MD 2296 (RJS)
12 MC 2296 (RJS)

Case No. 1:12-cv-2652 (RJS)

**STATEMENT REGARDING NOTICE OF APPEARANCE
AND REQUEST FOR SERVICE OF DOCUMENTS**

PLEASE TAKE NOTICE THAT the undersigned believes that (i) there is no legal entity named *GM Promark Large Cap Blend Fund* ("**GM Promark**"), (ii) there has not been proper service of the complaint in the above-captioned action on GM Promark, and (iii) the time to effectuate such service has expired, and the statute of limitations has run.

PLEASE TAKE FURTHER NOTICE THAT the undersigned is filing this notice in case the above-captioned Plaintiff seeks to take any further action against GM Promark. The filing of this document shall not constitute a waiver of any jurisdictional or other defenses herein, and shall not constitute a waiver of any other relief. Any further notices or pleadings directed at GM Promark shall be forwarded to:

King & Spalding LLP
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New York, New York 10036
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Dated: March 7, 2014
New York, New York

KING & SPALDING LLP

By: /s/ Arthur Steinberg
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Scott Davidson
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